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May 4, 2021

Via ECF

The Honorable Raymond J. Dearie
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

**Re: Yelena Ruderman v. Law Office of Yuriy Prakhin, P.C., et al.
E.D.N.Y. Case No. 19-cv-02987 (RJD) (RLM)**

Dear Judge Dearie:

This firm represents Defendants, Law Office of Yuriy Prakhin (the "Firm") and Yuriy Prakhin, Esq. ("Mr. Prakhin") (collectively, "Defendants") in the above-referenced action. We write to respectfully submit the attached joint proposed briefing schedule for Defendants' motion for summary judgment.

On March 15, 2021, in accordance with Your Honor's Individual Rules, Defendants moved for a pre-motion conference regarding their intent to move for summary judgment. (ECF No. 60). On April 20, 2021, Your Honor issued an Order waiving the pre-motion conference and encouraging the parties to resolve this matter or proceed with trial. After thorough consideration, Defendants wish to proceed with their meritorious motion for summary judgment pursuant to Rule 56 of the Federal Rules of Civil Procedure. *See Eisemann v. Greene*, 204 F.3d 393, 397 (2d Cir. 2000); *Richardson Greenshields Sec., Inc. v. Lau*, 825 F.2d 647, 652 (2d Cir. 1987).

Accordingly, Defendants respectfully submit the attached proposed briefing schedule to be So Ordered by the Court. Plaintiff's counsel has consented to this schedule.

Thank you for Your Honor's consideration in this matter.

Respectfully submitted,

/s/ MED

Mary Ellen Donnelly

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

YELENA RUDERMAN,

Plaintiff,

- against -

**LAW OFFICE OF YURIY PRAKHIN, P.C., and
YURIY PRAKHIN, in both his individual and
professional capacities,**

Defendants.

Case No. 19-cv-2987 (RJD) (RLM)

**JOINT STIPULATION REGARDING
BRIEFING SCHEDULE**

Pursuant to Rule 56 of the Federal Rules of Civil Procedure, and Local Civil Rule 6.1, it is stipulated between and among Plaintiff Yelena Ruderman (“Plaintiff”) and Defendants Law Office of Yuriy Prakhin, P.C., and Yuriy Prakhin, Esq. (collectively, “Defendants”), (collectively, the “Parties”) by and through their respective counsel, as follows:

WHEREAS, on March 15, 2021, Defendants moved for a pre-motion conference regarding their motion for summary judgment pursuant to Judge Dearie’s Individual Motion Practices and Rules;

WHEREAS, on April 20, 2021, the Court waived the pre-motion conference;

NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the Parties, through their respective counsel and subject to the Court’s approval, that:

- 1) Defendants shall file and serve any Motion for Summary Judgment by May 11, 2021.
- 2) Plaintiff shall file and serve any Response by June 23, 2021.
- 3) Defendants shall file and serve any Reply by July 7, 2021.

IT IS SO STIPULATED.

Dated: New York, New York
May 4, 2021

Dated: New York, New York
May 4, 2021

/s/ IMH

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/s/ MED

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Attorneys for Defendants

SO ORDERED:

s/RJD

Hon. Raymond J. Dearie
U.S.D.J.